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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN CHANG & WEILIN CHANG,

Defendants.

Case No. 16-cr-00047 EJD

**DEFENDANTS JONATHAN & WEILIN
CHANG'S PROPOSED COURT JURY
QUESTIONNAIRE WITH ADDED
RELIGION AND RACE QUESTIONS**

The defense respectfully submits the Court's standard jury questionnaire with the additional religion, race or ethnicity, and national origin questions discussed at the July 31, 2019 pretrial conference.

Dated: AUGUST 2, 2019

Respectfully submitted,

/s/
Christopher J. Cannon
Matthew A. Laws
Attorneys for WEILIN CHANG

/s/
Julia M. Jayne
Attorney for JONATHAN CHANG

JUROR QUESTIONNAIRE

1. NAME: _____ Dr. Mr. Mrs. Ms. Miss Age: _____
2. Residence: County: _____ City/Town: _____ Neighborhood: _____
[Do not list your street address]
 How long have you lived at that location? _____
 Your place of birth: _____
 Do you own or rent your home? Rent _____ Own _____ Other _____
 What other communities have you lived during the last ten years? _____

3. What is your marital status: (please circle)
 Single Married Separated Divorced Widowed Live with a partner
 Any prior marriages? Yes _____ No _____ If Yes, how many? _____
4. What is your current job status?
 _____ Working full-time _____ Unemployed
 _____ Working part-time _____ Homemaker
 _____ Retired _____ Full-time student
 _____ Disabled
5. What is your occupation? [PLEASE NOTE: If you are currently not employed, retired, disabled or a homemaker, please describe your most recent prior employment]
 a. What is your occupation (or what was it, if not currently employed)?

 b. By whom are (were) you employed? _____
 c. How long have (did) you worked there? _____
 d. Please describe the nature of your job. _____
 e. Do (Did) you supervise other people? Yes _____ No _____ If so, how many? _____
6. What is the highest level of education you completed? _____
7. Please describe your educational background:
Major areas of study Degrees received

Please complete regarding your **present spouse** or **partner**. If you are widowed, divorced or separated, please answer all the following questions regarding your **former spouse/partner**.

8. Current employment status:
 _____ Working full-time _____ Unemployed _____ Disabled
 _____ Working part-time _____ Homemaker
 _____ Retired _____ Full-time student

a. What is his/her occupation (or what was it, if retired or unemployed or disabled)?

b. By whom is (was) s/he employed? _____

How long has (did) s/he worked there? _____

c. Please describe the nature of his/her job? _____

d. What other types of jobs has s/he had in the past? _____

9. What is the highest level of education she/he completed? _____

Please describe her/his educational background, including vocational school(s) and/or college(s) attended:

Major areas of study

Degrees received

10. If you have children, please state:

Sex

Age

Education

Occupation

11. If other adults live in your home in addition to those already you already described above, please state:

Relationship

Sex

Age

Education

Occupation

12. What are your hobbies, major interests, recreational pastimes and spare-time activities and sports?

13. Please list all groups and organizations you belong to or participate in, including but not limited to service, community and neighborhood groups; crime prevention groups; volunteer activities; and groups concerned with the criminal justice system.

14. Please list your main sources of news -- including newspapers, television and radio stations or programs, internet sites and conversations with others:

15. Have you previously served as a trial juror or as a grand juror? Yes____ No____
If yes, please complete for each case on which you served:

	Civil or Criminal	Nature of case (i.e., robbery or personal injury)	When/Where?	Verdict reached? (yes or no)
1				
2				
3				
4				
5				

- a. Have you ever served as a jury foreperson? Yes____ No____
b. Is there any reason that your prior jury service would affect your ability to be fair, objective and impartial to both sides at trial? Yes____ No____ If Yes, please explain:

16. Is there anything about your experiences, opinions or beliefs about race, color, immigration status, national origin, ethnicity, sex or sexual orientation which would strongly influence your ability to judge the facts of a criminal case or the person accused? Yes____ No____
If yes, please explain:_____

17. Do you understand, speak, read, or write Mandarin?

- a. Understand Mandarin? ____Yes ____No
b. Speak Mandarin? ____Yes ____No
c. Read Mandarin? ____Yes ____No
d. Write Mandarin? ____Yes ____No

18. Are you a member of any church or religious organization? If yes, please list and identify any leadership roles. Yes _____ No _____ If yes, please describe: _____

19. Do you have any strong feelings about organized religion?
Yes _____ No _____ If yes, please explain: _____

20. Do you donate to any religious organizations?
Yes _____ No _____ If yes, please list: _____

21. Are there any stereotypes you have heard about people of Chinese or Taiwanese ancestry that you believe are correct or have a grain of truth to them?
Yes _____ No _____ If yes, please describe: _____

22. Have you ever had any negative experiences with a person of Chinese or Taiwanese ancestry, or with a company based in China or Taiwan?
Yes _____ No _____ If yes, please describe: _____

23. Have you ever had a significant negative experience involving a person of Chinese descent that you believe would not have occurred had the person been of a different background?
Yes____ No____ If yes, please describe: _____

24. Do you have any opinions or knowledge about the attitudes of Chinese immigrants toward law enforcement in the United States?
Yes____ No____ If yes, please describe: _____

25. Do you have any experiences, views, or beliefs that would prevent you from being fair and impartial in a trial involving people of Chinese or Taiwanese ancestry?
Yes____ No____ If yes, please explain: _____

26. This case involves the activities of a Christian church and several non-profit organizations. Is there anything about this subject matter that would cause you to hesitate participating as a juror in this case?
Yes____ No____ If yes, please explain: _____

27. The court will instruct you on the laws and your duties as jurors. Will you be able to follow these instructions even if you disagree with them? Yes____ No____ If No, please explain:

28. Is there any matter not covered by this questionnaire that should be brought to the attention of the court and the lawyers because it might affect your ability to be a fair and impartial juror?

Yes____ No____ If Yes, please explain:

29. Is there any matter you would prefer to discuss privately with the court?

Yes____ No____ If Yes, please explain:

JUROR'S OATH

I declare under penalty of perjury that the answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing this questionnaire.

Signature:_____

Print Name:_____

Date: _____

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